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16                   **UNITED STATES DISTRICT COURT**  
17                   **NORTHERN DISTRICT OF CALIFORNIA**  
18                   **(SAN JOSE DIVISION)**

19 In re: HP INKJET PRINTER  
20 LITIGATION,

21 This Document Relates To:

22                   All Actions

23                   Master File No. C05-3580 JF

24                   **JOINT STIPULATION RE APRIL 9, 2010**  
25                   **STATUS CONFERENCE AND PROPOSED**  
26                   **PLAN FOR FILING SETTLEMENT**  
27                   **PAPERS AND MOTION FOR**  
28                   **PRELIMINARY APPROVAL OF CLASS**  
                    **SETTLEMENT; DECLARATION OF**  
                    **SAMUEL G. LIVERSIDGE**

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29                   **JOINT STIPULATION RE APRIL 9, 2010 STATUS CONFERENCE AND PROPOSED PLAN FOR FILING SETTLEMENT**  
                    **PAPERS AND MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT; DECLARATION OF SAMUEL G.**  
                    **LIVERSIDGE**

30 Case No. 05-3580 JF

1           WHEREAS, on February 5, 2010, the Court took Plaintiffs' motion for certification of a  
 2 California class and motion for leave to add a new class representative off calendar because the  
 3 parties were engaging in settlement discussions;

4           WHEREAS, on February 5, 2010, the Court scheduled a Status Conference in this matter for  
 5 April 9, 2010;

6           WHEREAS, the parties have reached an agreement in principle to settle this action as well as  
 7 two other actions against Hewlett-Packard Company pending before this Court: *Rich v. Hewlett-*  
 8 *Packard Company*, Case No. C06-03361-JF, and *Blennis v. Hewlett-Packard Company*, Case No.  
 9 C07-00333-JF;

10          WHEREAS, the parties have begun drafting a written settlement agreement to memorialize  
 11 the specific terms of the settlement, and they intend to submit a written settlement agreement and a  
 12 motion for preliminary approval of class settlement by June 4, 2010; and

13          WHEREAS, a declaration of counsel providing the information required by Local Civil Rule  
 14 6-2 follows this stipulation.

15          THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between the  
 16 undersigned counsel that (1) the Status Conference currently scheduled for April 9, 2010, be taken off  
 17 calendar, (2) the parties will make a good faith effort to file a written settlement agreement and a  
 18 motion for preliminary approval of class settlement with the Court by June 4, 2010, and (3) if the

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1 parties are unable to complete and file these documents by June 4, 2010, a joint status report will be  
2 filed in lieu of these documents.

3 **IT IS SO STIPULATED.**

4  
5 Dated: April 5, 2010

6 COTCHETT, PITRE & McCARTHY  
7 McNICHOLAS & McNICHOLAS, LLP  
SEEGER WEISS, LLP

8 \_\_\_\_\_  
9 /s/ Niall P. McCarthy\*  
Niall P. McCarthy

10 *Co-Lead Counsel for Plaintiffs and the Class*

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LAW OFFICES OF SCOTT E. SHAPIRO, P.C.

20  
21 Dated: April 5, 2010

22 GIBSON, DUNN & CRUTCHER LLP

23 \_\_\_\_\_  
/s/ Samuel G. Liversidge\*  
Samuel G. Liversidge

24 *Attorneys for Defendant Hewlett-Packard Company*

25 \*I hereby attest that I have on file all holograph  
26 signatures for any signatures indicated by a  
“conformed” signature (/s/) within this efiled  
27 document.

**DECLARATION OF SAMUEL G. LIVERSIDGE  
IN SUPPORT OF THE JOINT STIPULATION**

I, Samuel G. Liversidge, declare as follows:

1. I am an attorney duly admitted to practice law in the State of California and in this Court. I am a partner at the law firm of Gibson, Dunn & Crutcher LLP, and one of the counsel of record for Hewlett-Packard Company (“HP”) in this case. I have personal knowledge of the facts set forth below, and if called upon to testify, I could and would competently testify to them. I make this declaration in support of the parties’ Joint Stipulation re April 9, 2010 Status Conference And Proposed Plan For Filing Settlement Papers and Motion for Preliminary Approval Of Class Settlement.

2. On February 5, 2010, the Court took Plaintiffs' pending motions off calendar after the parties informed the Court that they were engaging in settlement negotiations. The Court then set a Status Conference for April 9, 2010.

3. The parties have reached an agreement in principle to settle this action as well as two other actions against HP pending before this Court: *Rich v. Hewlett-Packard Company*, Case No. C06-03361-JF, and *Blennis v. Hewlett-Packard Company*, Case No. C07-00333-JF.

4. The parties have begun drafting a written settlement agreement to memorialize the specific terms of the settlement, and they propose to submit a written settlement agreement and a motion for preliminary approval of class settlement by June 4, 2010.

5. The parties have agreed and respectfully propose that the Court enter an order taking the Status Conference currently scheduled for April 9, 2010, off calendar. The parties will make a good faith effort to file a written settlement agreement and a motion for preliminary approval of class settlement by June 4, 2010. If the parties, however, are unable to complete and file these documents by June 4, 2010, a joint status report will be filed in lieu of these documents.

6. The Court has not set any dates other than the date for the Status Conference. Therefore, granting this stipulation would only affect the date of the Status Conference and does not affect any other deadlines or hearing dates.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed in Los Angeles, California on April 5, 2010.

/s/ Samuel G. Liversidge\*  
Samuel G. Liversidge